







Reclassification of Major MACT Sources to Area Sources (OIAI) (Part 63 Subpart A) (SAN: 4908, Tier 2, Sara Ayres). OAQPS agreed to request from OECA/OP for up-tier. Options Selection scheduled for September 27. OAR management may push to get NPRM signature before EPA's response brief on litigation is due 12/21/18. Also, a draft guidance memo on how applicability determinations should reference the 2018 Wehrum Memo on Reclassification has been prepared for possible joint signature from OECA/OAR AAs to the RA's.

